

Congress of the United States
House of Representatives
Washington, DC 20515-3313

May 16, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Pruitt:

Thank you for your efforts in the service of our country. I write today to bring your attention to the final rule for Formaldehyde Emissions Standards for composite wood products.

While, I commend you for delaying the effective date of this rule until May 22, 2017, I urge your agency to take further action by adjusting the compliance dates to reflect the time periods laid out in the original rule. Furthermore, I ask that you provide manufacturers an additional 12-month extension to ensure there is sufficient time for them to adjust. Third-party certifiers, panel manufacturers, fabricators, importers, distributors, and retailers are all under pressure to comply with this rule so this additional time could be the difference between them shutting down or staying in business.

I am most concerned about the effects this rule might have on smaller manufacturers of composite wood products, as they are more likely to struggle to come into compliance in a shorter time frame. And this makes sense, as they are less likely to have the resources to absorb the estimated \$38-\$83 million dollar costs estimated with this rule. This number is hard to quantify as many of the costs are hidden.

As you may know, the Composite Panel Association (CPA), the trade association for the North American industry, has already worked with regulators to implement and develop progressive industry standards similar to those found under the California Air Resources Board which are the strictest in the country. Therefore, the composite wood industry has already taken steps to address any environmental concerns associated with formaldehyde in their products. And this makes sense, as formaldehyde is known to have negative health effects, as recognized by industry. However, there are certain elements of this rule that my constituents are concerned with, which as I said earlier, unfairly target smaller manufacturers. The new testing, labeling, and bookkeeping requirements will increase their costs of doing business, all while providing no benefit to the environment.

The United States is already facing increased competition in the composite wood industry from the Chinese and our standards are superior to theirs. Exposed by *60 Minutes*, the Chinese composite wood industry is far below our standards, and exposes the American consumer to unnecessary health risks associated with the increased formaldehyde in their product. By not

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delaying the implementation date of this rule, we risk harming not only American manufacturing, but also are opening consumers to added health risks. So, this regulation strikes me as somewhat arbitrary in its effects here.

I hope you'll have time to review the harmful effects of this rule on the composite wood industry as your agency continues its evaluation of recently implemented regulations. Once again, I ask that you please consider adjusting the compliance dates to reflect the time periods laid out in the original rule along with the 12-month extension.

Sincerely,



Ted Budd
Member of Congress, NC-13

